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Sable Offshore Corp.*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

CENTER FOR BIOLOGICAL
DIVERSITY, et al.,

Plaintiffs,

v.

DOUG BURGUM, et al.,

Defendants,

and

SABLE OFFSHORE CORP.,

Intervenor-Defendant.

CASE NO. 2:24-cv-05459-MWC-MAA

**SABLE OFFSHORE CORP.'S
ANSWER TO SECOND
SUPPLEMENTAL AND AMENDED
COMPLAINT FOR DECLARATORY
AND OTHER RELIEF**

Judge: Hon. Michelle Williams Court
Courtroom: 6A

Intervenor-Defendant Sable Offshore Corp. (“Sable”) hereby answers Plaintiffs’ Second Supplemental and Amended Complaint (Dkt. #104). Sable denies every allegation in Plaintiffs’ Second Supplemental and Amended Complaint not expressly admitted in this Answer and specifically denies that Defendants violated the Administrative Procedure Act (“APA”), Outer Continental Shelf Lands Act (“OCSLA”), and National Environmental Policy Act (“NEPA”).

Introduction

1. Paragraph 1 sets forth legal conclusions, which require no response. To the extent that a response is required, Sable denies the allegations in Paragraph 1.

2. Sable avers that oil and gas production from the Santa Ynez Unit was shut-in due to an incident associated with the onshore Plains All American Pipeline. Sable lacks knowledge or information sufficient to form a belief about the truth of the remaining assertions in Paragraph 2, and, on that basis, denies the same.

3. Sable admits that the Bureau of Safety and Environmental Enforcement (“BSEE”) authorized extensions of time to resume operations relating to the Santa Ynez Unit annually since 2015 and that BSEE approved an extension of time to resume operations on November 14, 2023. Sable lacks knowledge or information sufficient to form a belief about the truth of the remaining assertions in Paragraph 3, and, on that basis, denies the same.

4. Paragraph 4 sets forth legal conclusions, which require no response. To the extent that a response is required, Sable denies the allegations in Paragraph 4.

5. Sable denies the allegations in Paragraph 5.

6. Paragraph 6 contains Plaintiffs’ characterization of a statute and regulation, and Paragraph 6 sets forth a legal conclusion, which require no

1 response. To the extent that a response is required, the statute and regulation speak
2 for themselves and are the best evidence of their content, and the allegations of the
3 first and second sentences of Paragraph 6 are otherwise denied. Sable denies the
4 allegations in the third sentence of Paragraph 6.

5 7. Paragraph 7 sets forth legal conclusions, which require no response.
6 To the extent that a response is required, Sable denies the allegations in
7 Paragraph 7.

8 8. Paragraph 8 sets forth legal conclusions, which require no response.
9 To the extent that a response is required, Sable denies the allegations in Paragraph
10 8.

11 9. Sable admits that Plaintiffs filed this lawsuit. The remainder of
12 Paragraph 9 characterizes Plaintiffs' lawsuit and sets forth legal conclusions, which
13 requires no response. To the extent that a response is required, Sable denies the
14 allegations in Paragraph 9. Sable further avers that in 2015, 2016, 2017, 2018,
15 2019, 2020, 2021, and 2022, BSEE also granted extensions of time to resume
16 operations under the Santa Ynez Unit leases. On information and belief, Plaintiffs
17 did not challenge any of these prior extensions.

18 10. Sable admits that it consummated the acquisition of the Santa Ynez
19 Unit leases and associated infrastructure in February 2024, that it submitted
20 applications for permits to modify to BSEE on September 19, 2024 two wells, and
21 that BSEE approved those applications on September 25, 2024. Sable avers that it
22 acquired the Santa Ynez Unit assets from Exxon Mobil Corporation and Mobil
23 Pacific Pipeline Company. Sable denies the remaining allegations in Paragraph 10.

24 11. Paragraph 11 sets forth legal conclusions, which require no response.
25 To the extent that a response is required, Sable denies the allegations in Paragraph
26 11.

27 12. Paragraph 12 sets forth legal conclusions, which require no response.
28

1 To the extent that a response is required, Sable denies the allegations in Paragraph
2 12.

3 13. Paragraph 13 sets forth legal conclusions, which require no response.
4 To the extent that a response is required, Sable denies the allegations in Paragraph
5 13.

6 14. Paragraph 14 sets forth legal conclusions, which require no response.
7 To the extent that a response is required, Sable denies the allegations in Paragraph
8 14.

9 15. Sable admits that Plaintiffs filed their Second Supplemental and
10 Amended Complaint. The remainder of Paragraph 15 characterizes Plaintiffs'
11 Complaint and sets forth legal conclusions, which requires no response. To the
12 extent that a response is required, Sable denies the allegations in Paragraph 15.

13 16. Sable admits that on May 28, 2025 BSEE issued a Finding of No
14 Significant Impact ("FONSI") and relied on an Environmental Assessment ("EA")
15 regarding the Santa Ynez Unit request for extension of time to resume operations,
16 and that on May 29, 2025 BSEE issued a decision re-affirming the extension of
17 time to resume operations. The remainder of Paragraph 16 contains Plaintiffs'
18 characterization of BSEE's actions, which speak for themselves and are the best
19 evidence of their contents. To the extent that a response is otherwise required,
20 Sable denies the allegations in Paragraph 16.

21 17. Sable admits that from July 2 to July 3 BSEE issued nine APMs to
22 Sable. The allegations in the second sentence of Paragraph 17 purport to
23 characterize certain permits, are vague and ambiguous and, accordingly, no
24 response is required. To the extent that a response is required, Sable denies that
25 Paragraph 17 accurately characterizes those permits.

26 18. Paragraph 18 contains Plaintiffs' characterization of a BSEE press
27 release, which requires no response. To the extent that a response is required, the
28

1 press release speaks for itself and is the best evidence of its content, and the
2 allegations in Paragraph 18 are otherwise denied.

3 19. Paragraph 19 characterizes Plaintiffs' lawsuit and requested relief,
4 which requires no response. Sable denies that Plaintiffs are entitled to any relief.

5 20. Sable denies the allegations in Paragraph 20.

6 **Jurisdiction and Venue**

7 21. Paragraph 21 sets forth legal conclusions, which require no response.
8 To the extent that a response is required, Sable denies the allegations in
9 Paragraph 21.

10 22. Paragraph 22 sets forth legal conclusions, which require no response.
11 To the extent that a response is required, Sable denies the allegations in
12 Paragraph 22.

13 23. Paragraph 23 sets forth legal conclusions, which require no response.
14 To the extent that a response is required, Sable denies the allegations in
15 Paragraph 23.

16 **Parties**

17 **Plaintiffs**

18 24. The allegations in Paragraph 24 pertain to Plaintiff Center for
19 Biological Diversity's ("CBD") description of itself. Sable lacks knowledge or
20 information sufficient to form a belief about the truth of the assertions in Paragraph
21 24, and, on that basis, denies the same.

22 25. The allegations in Paragraph 25 pertain to Plaintiff CBD's description
23 of its Oceans Program. Sable lacks knowledge or information sufficient to form a
24 belief about the truth of the assertions in Paragraph 25, and, on that basis, denies
25 the same.

26 26. The allegations in Paragraph 26 pertain to Plaintiff CBD's description
27 of its members' activities. Sable lacks knowledge or information sufficient to form
28

1 a belief about the truth of the assertions in Paragraph 26, and, on that basis, denies
2 the same.

3 27. The allegations in Paragraph 27 pertain to Plaintiff Wishtoyo
4 Foundation's ("Wishtoyo") description of itself. Sable lacks knowledge or
5 information sufficient to form a belief about the truth of the assertions in Paragraph
6 27, and, on that basis, denies the same.

7 28. The allegations in Paragraph 28 pertain to Plaintiff Wishtoyo's
8 description of its members' interests. Sable lacks knowledge or information
9 sufficient to form a belief about the truth of the assertions in Paragraph 28, and, on
10 that basis, denies the same.

11 29. The allegations in Paragraph 29 pertain to Plaintiff Wishtoyo's
12 description of its members' interests. Sable lacks knowledge or information
13 sufficient to form a belief about the truth of the assertions in Paragraph 29, and, on
14 that basis, denies the same.

15 30. The allegations in Paragraph 30 purport to characterize the risks from
16 oil and gas infrastructure, are vague and ambiguous and, accordingly, no response
17 is required. To the extent that a response is required, Sable denies that the
18 paragraph accurately characterizes the risks from oil and gas infrastructure,
19 particularly with respect to oil and gas infrastructure in the Pacific Region.

20 31. The allegations in Paragraph 31 purport to characterize the risks from
21 offshore drilling activities, are vague and ambiguous and, accordingly, no response
22 is required. To the extent that a response is required, Sable denies that the
23 paragraph accurately characterizes the risks from offshore drilling activities.

24 32. The allegations in Paragraph 32 are denied.

25 33. The first sentence of Paragraph 33 contains Plaintiffs' characterization
26 of agency approvals, which requires no response. To the extent that a response is
27 required, the approvals speak for themselves and are the best evidence of their
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1 content. Sable denies the remaining allegations in Paragraph 33.

2 34. The allegations in Paragraph 34 are denied.

3 35. Sable lacks knowledge or information sufficient to form a belief about
4 the truth of the assertions in Paragraph 35, and, on that basis, denies the same.

5 36. The allegations in Paragraph 36 are denied.

6 37. The allegations in Paragraph 37 are denied.

7 38. The allegations in Paragraph 38 are denied.

8 **Defendants**

9 39. Sable admits that Doug Burgum is the current Secretary of the U.S.
10 Department of the Interior (“DOI”). The remainder of Paragraph 39 contains
11 Plaintiffs’ characterization of the Secretary of the Interior’s and the DOI’s roles,
12 which requires no response. To the extent that a response is required, Sable denies
13 the allegations in Paragraph 39.

14 40. Sable admits that the BSEE is a federal agency within DOI. The
15 remainder of Paragraph 40 contains Plaintiffs’ characterization of BSEE’s role,
16 which requires no response. To the extent that a response is required, Sable denies
17 the allegations in Paragraph 40.

18 41. Sable admits that Bobby Kurtz is the current Acting Regional Director
19 of the Pacific Region of BSEE. The remainder of Paragraph 41 contains Plaintiffs’
20 characterization of Mr. Kurtz’s role, which requires no response. To the extent
21 that a response is required, Sable denies the allegations in Paragraph 41.

22 **Statutory Background**

23 **Outer Continental Shelf Lands Act**

24 42. Paragraph 42 contains Plaintiffs’ characterization of a statute and a
25 legal conclusion, which requires no response. To the extent that a response is
26 required, the statute speaks for itself and is the best evidence of its content. Sable
27 denies any allegations in Paragraph 42 that are inconsistent with the plain language
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1 of the statute.

2 43. Paragraph 43 purports to quote a statute, which requires no response.
3 To the extent that a response is required, the statute speaks for itself and is the best
4 evidence of its content. Sable denies any allegations in Paragraph 43 that are
5 inconsistent with the plain language of the statute.

6 44. Paragraph 44 purports to quote a court opinion and contains legal
7 conclusions, which require no response. To the extent that a response is required,
8 the court's opinion speaks for itself and is the best evidence of its content. Sable
9 denies any allegations in Paragraph 44 that are inconsistent with the plain language
10 of the court's decision.

11 45. Paragraph 45 purports to quote a statute, which requires no response.
12 To the extent that a response is required, the statute speaks for itself and is the best
13 evidence of its content. Sable denies any allegations in Paragraph 45 that are
14 inconsistent with the plain language of the statute.

15 46. Paragraph 46 purports to quote a statute, which requires no response.
16 To the extent that a response is required, the statute speaks for itself and is the best
17 evidence of its content. Sable denies any allegations in Paragraph 46 that are
18 inconsistent with the plain language of the statute.

19 47. Paragraph 47 purports to quote a statute, which requires no response.
20 To the extent that a response is required, the statute speaks for itself and is the best
21 evidence of its content. Sable denies any allegations in Paragraph 47 that are
22 inconsistent with the plain language of the statute.

23 48. Paragraph 48 purports to quote a statute, which requires no response.
24 To the extent that a response is required, the statute speaks for itself and is the best
25 evidence of its content. Sable denies any allegations in Paragraph 48 that are
26 inconsistent with the plain language of the statute.

27 49. Paragraph 49 contains Plaintiffs' characterization of regulations and a
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1 legal conclusion, which require no response. To the extent that a response is
2 required, the regulations speak for themselves and are the best evidence of their
3 content. Sable denies any allegations in Paragraph 49 that are inconsistent with the
4 plain language of the regulations.

5 50. Paragraph 50 contains Plaintiffs' characterization of regulations and a
6 legal conclusion, which require no response. To the extent that a response is
7 required, the regulations speak for themselves and are the best evidence of their
8 content. Sable denies any allegations in Paragraph 50 that are inconsistent with the
9 plain language of the regulations.

10 51. Paragraph 51 purports to quote a regulation, which requires no
11 response. To the extent that a response is required, the regulation speaks for itself
12 and is the best evidence of its content. Sable denies any allegations in Paragraph
13 51 that are inconsistent with the plain language of the regulation.

14 52. Paragraph 52 purports to quote a regulation and a court opinion,
15 which requires no response. To the extent that a response is required, the
16 regulation and court opinion speak for themselves and are the best evidence of
17 their content. Sable denies any allegations in Paragraph 52 that are inconsistent
18 with the plain language of the regulation or court opinion.

19 53. Paragraph 53 purports to quote regulations, which requires no
20 response. To the extent that a response is required, the regulations speak for
21 themselves and are the best evidence of their content. Sable denies any allegations
22 in Paragraph 53 that are inconsistent with the plain language of the regulations.

23 **National Environmental Policy Act**

24 54. Paragraph 54 purports to quote a statute, which requires no response.
25 To the extent that a response is required, the statute speaks for itself and is the best
26 evidence of its content. Sable denies any allegations in Paragraph 54 that are
27 inconsistent with the plain language of the statute.

1 55. Paragraph 55 purports to quote a court opinion, which requires no
2 response. To the extent that a response is required, the court opinion speaks for
3 itself and is the best evidence of its content. Sable denies any allegations in
4 Paragraph 55 that are inconsistent with the plain language of the court opinion.

5 56. Paragraph 56 purports to quote a statute, which requires no response.
6 To the extent that a response is required, the statute speaks for itself and is the best
7 evidence of its content. Sable denies any allegations in Paragraph 56 that are
8 inconsistent with the plain language of the statute.

9 57. Paragraph 57 contains Plaintiffs' characterization of a statute and a
10 legal conclusion, which require no response. To the extent that a response is
11 required, the statute speaks for itself and is the best evidence of its content. Sable
12 denies any allegations in Paragraph 57 that are inconsistent with the plain language
13 of the statute.

14 58. Paragraph 58 and footnote 1 to Paragraph 58 contain Plaintiffs'
15 characterization of regulations and a statute and sets forth legal conclusions,
16 including with respect to applicability of regulations, which require no response.
17 To the extent that a response is required, the regulations and the statute speak for
18 themselves and are the best evidence of their content. Sable denies any allegations
19 in Paragraph 58 and footnote 1 that are inconsistent with the plain language of the
20 regulations and statute.

21 59. Paragraph 59 contains Plaintiffs' characterization of regulations and a
22 statute and sets forth legal conclusions, which require no response. To the extent
23 that a response is required, the regulations and statute speak for themselves and are
24 the best evidence of their content. Sable denies any allegations in Paragraph 59
25 that are inconsistent with the plain language of the regulations and statute.

26 60. Sable admits the allegation in Paragraph 60. Sable avers that the
27 DOI's Departmental Manual has been revised to reflect revisions to the DOI's
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1 NEPA Manual (effective June 30, 2025).

2 61. The allegations in Paragraph 61 characterize certain categorical
3 exclusions, which speak for themselves and are the best evidence of their content.
4 Sable denies any allegations in Paragraph 61 that are inconsistent with the plain
5 language of the categorical exclusions.

6 62. Paragraph 62 contains Plaintiffs' characterization of a regulation and
7 sets forth legal conclusions, which require no response. To the extent that a
8 response is required, the regulation speaks for itself and is the best evidence of its
9 content. Sable denies any allegations in Paragraph 62 that are inconsistent with the
10 plain language of the regulation.

11 63. Paragraph 63 contains Plaintiffs' characterization of a regulation and
12 sets forth legal conclusions, which require no response. To the extent that a
13 response is required, the regulation speaks for itself and is the best evidence of its
14 content. Sable denies any allegations in Paragraph 63 that are inconsistent with the
15 plain language of the regulation.

16 64. Paragraph 64 contains Plaintiffs' characterization of a regulation and
17 sets forth legal conclusions, which require no response. To the extent that a
18 response is required, the regulation speaks for itself and is the best evidence of its
19 content. Sable denies any allegations in Paragraph 64 that are inconsistent with the
20 plain language of the regulation.

21 65. Paragraph 65 contains Plaintiffs' characterization of BSEE's
22 interpretation of its regulations, which requires no response. To the extent that a
23 response is required, the regulations speak for themselves and are the best evidence
24 of their content. Sable denies any allegations in Paragraph 65 that are inconsistent
25 with the plain language of the regulations.

26 66. Paragraph 66 contains Plaintiffs' characterization of a statute, which
27 requires no response. To the extent that a response is required, the statute speaks
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1 for itself and is the best evidence of its content. Sable denies any allegations in
2 Paragraph 66 that are inconsistent with the plain language of the statute.

3 67. Paragraph 67 purports to quote multiple court opinions and contains
4 legal conclusions, which require no response. To the extent that a response is
5 required, the court opinions speak for themselves and are the best evidence of their
6 content. Sable denies any allegations in Paragraph 67 that are inconsistent with the
7 plain language of the court opinions.

8 68. Paragraph 68 contains Plaintiffs' characterization of a statute and sets
9 forth legal conclusions, which require no response. To the extent that a response is
10 required, the statute speaks for itself and is the best evidence of its content. Sable
11 denies any allegations in Paragraph 68 that are inconsistent with the plain language
12 of the statute.

13 69. Paragraph 69 and footnote 2 contain Plaintiffs' characterization of
14 regulations, court opinions, and an agency manual, and set forth legal conclusions,
15 including with respect to the application of the regulations to BSEE's actions,
16 which require no response. To the extent that a response is required, the
17 regulations, court opinions, and agency manual speak for themselves and are the
18 best evidence of their content. Sable denies any allegations in Paragraph 69 and
19 footnote 2 that are inconsistent with the plain language of the regulations, court
20 opinions, and agency manual.

21 **Administrative Procedure Act**

22 70. Paragraph 70 contains Plaintiffs' characterization of a statute, which
23 requires no response. To the extent that a response is required, the statute speaks
24 for itself and is the best evidence of its content. Sable denies any allegations in
25 Paragraph 70 that are inconsistent with the plain language of the statute.

26 71. Paragraph 71 contains Plaintiffs' characterization of a statute, which
27 requires no response. To the extent that a response is required, the statute speaks
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1 for itself and is the best evidence of its content. Sable denies any allegations in
2 Paragraph 71 that are inconsistent with the plain language of the statute.

3 **Factual Background**

4 72. Sable lacks knowledge or information sufficient to form a belief about
5 the truth of the assertions in Paragraph 72, and, on that basis, denies the same.

6 73. Sable admits the second, third, fourth, and fifth sentences of
7 Paragraph 73. Sable avers that the leases have been properly maintained beyond
8 the initial term. Sable lacks knowledge or information sufficient to form a belief
9 about the truth of the remaining assertions in Paragraph 73, and, on that basis,
10 denies the same.

11 74. Sable admits that oil and gas production has occurred under the Santa
12 Ynez Unit leases from Platform Harmony, Platform Heritage, and Platform Hondo.
13 Sable admits that Platform Harmony and Platform Heritage were installed in 1989,
14 and Platform Hondo was installed in 1976. Sable lacks knowledge or information
15 sufficient to form a belief about the truth of the remaining assertions in Paragraph
16 74, and, on that basis, denies the same.

17 75. The allegations of the first sentence of Paragraph 75 are vague and
18 ambiguous and are denied on that basis. The allegations in the second and third
19 sentences of Paragraph 75 purport to contain Plaintiffs' characterization of
20 ExxonMobil's development plan. The document speaks for itself and is the best
21 evidence of its content. On that basis, Sable denies any allegations in Paragraph 75
22 that are inconsistent with the plain language of the document. Sable admits that
23 first production began in 1981 and denies that the production from the Santa Ynez
24 Unit should have ceased by 2016. The allegations in the fourth sentence of
25 Paragraph 75 characterize an unidentified BSEE statement regarding recoverable
26 oil and gas reserves on the Pacific Out Continental Shelf. Any statement from
27 BSEE speaks for itself and is the best evidence of its contents. On that basis, Sable
28

1 denies any allegations in Paragraph 75 that are inconsistent with BSEE's
2 statements.

3 76. Sable admits that it is the listed owner and operator of Platforms
4 Harmony, Heritage, and Hondo and lessee on all 16 oil and gas leases in the Santa
5 Ynez Unit.

6 77. The allegations in Paragraph 77 are vague and ambiguous and are
7 either denied on that basis, or Sable lacks knowledge or information sufficient to
8 form a belief about the truth of the allegations in Paragraph 77, and, on that basis,
9 denies the same. Sable avers that Sable entered into a purchase and sale agreement
10 for certain assets formerly held by Exxon Mobil Corporation and Mobil Pacific
11 Pipeline Corporation on November 1, 2022 and completed the sale in February
12 2024.

13 78. The allegations in Paragraph 78 purport to characterize some
14 undefined conclusions by unnamed federal regulators regarding an onshore
15 pipeline incident, are vague and ambiguous and, accordingly, no response is
16 required. To the extent that a response is required, Sable denies that the paragraph
17 accurately characterizes conclusions by unnamed federal regulators.

18 79. Sable admits that ExxonMobil did not decommission the Harmony,
19 Heritage, and Hondo platforms. Sable lacks knowledge or information sufficient
20 to form a belief about the truth of the remaining assertions in Paragraph 79, and, on
21 that basis, denies the same.

22 80. The allegations in the first three sentences of Paragraph 80 purport to
23 characterize written actions taken by ExxonMobil and BSEE which speak for
24 themselves and are the best evidence of their contents. On that basis, Sable denies
25 any allegations in Paragraph 80 that are inconsistent with the plain language of the
26 documents. Sable further avers that in 2015, 2016, 2017, 2018, 2019, 2020, 2021,
27 and 2022, BSEE also granted extensions of time to resume operations under the
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1 Santa Ynez Unit leases. On information and belief, Plaintiffs did not challenge any
2 of these prior extensions before the 2023 extension. The remaining allegations in
3 Paragraph 80 set forth legal conclusions regarding the effect of BSEE's extensions
4 of time to resume operations, including on future Santa Ynez Unit approvals and
5 certain well work, which requires no response. To the extent that a response is
6 required, Sable denies the remaining allegations in Paragraph 80.

7 81. Sable admits that in connection with the purchase agreement in
8 February 2024 Sable acquired the Santa Ynez Unit leases, platforms, offshore and
9 onshore pipelines, and onshore processing facilities. Sable admits that in
10 connection with the purchase agreement Sable entered into a term loan with Exxon
11 Mobil Corporation. Sable denies the remaining allegations in Paragraph 81.

12 82. Paragraph 82 purports to characterize Sable's communications with
13 investors, which require no response. To the extent that a response is required, the
14 unspecified communications speak for themselves and are the best evidence of
15 their content. Sable denies the remaining allegations in Paragraph 82.

16 83. The allegations in Paragraph 83 purport to characterize an application
17 submitted to a state agency and unspecified Sable communications, which requires
18 no response. To the extent that a response is required, the application and
19 communications speak for themselves and are the best evidence of their contents.
20 Sable denies any allegations in Paragraph 83 that are inconsistent with the plain
21 language, meaning and context of these documents. The allegations in footnote 3
22 purport to characterize Sable's October 9, 2025 8-K report, which requires no
23 response. To the extent that a response is required, the October 9, 2025 8-K report
24 speaks for itself and is the best evidence of its content. On that basis, Sable denies
25 any allegations in footnote 3 that are inconsistent with the plain language of the
26 document.

27 84. Sable denies the allegations in Paragraph 84.
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1 85. Sable admits that in September 2024 it submitted applications for
2 permits to modify two already existing wells. The remaining allegations in
3 Paragraph 85 purport to characterize certain well work in the Santa Ynez Unit, are
4 vague and ambiguous and, accordingly, no response is required. To the extent that
5 a response is required, Sable denies that the paragraph accurately characterizes
6 well work in the Santa Ynez Unit.

7 86. The allegations in Paragraph 86 purport to characterize BSEE's
8 conclusions, which speak for themselves and are the best evidence of their content.
9 Sable denies any allegations in Paragraph 86 that are inconsistent with the plain
10 language, meaning and context of these documents.

11 87. Paragraph 87 sets forth legal conclusions, which require no response.
12 Further, the allegations in Paragraph 87 purport to characterize the content of
13 BSEE's conclusions, which speak for themselves and are the best evidence of their
14 content. Sable denies any allegations in Paragraph 87 that are inconsistent with the
15 plain language, meaning and context of these documents.

16 88. Sable avers that on September 19, 2024, Sable submitted applications
17 for permits to modify ("APMs") existing Well HE-23 and existing Well HE-28.
18 Sable admits that BSEE approved two APMs on September 25, 2024.

19 89. The first two sentences in Paragraph 89 set forth legal conclusions,
20 which require no response, and characterize BSEE's motion for voluntary remand,
21 which speaks for itself and is the best evidence of its content. Sable denies any
22 allegations in the first two sentences of Paragraph 89 that are inconsistent with the
23 plain language, meaning, and context of BSEE's motion for voluntary remand.
24 The remainder of Paragraph 89 purports to characterize this Court's decision
25 regarding BSEE's motion for voluntary remand, which speaks for itself and is the
26 best evidence of its content. Sable denies any allegations in Paragraph 89 that are
27 inconsistent with the plain language of this Court's decision.
28

1 90. Paragraph 90 purports to characterize a May 19, 2025 Sable
2 communication regarding oil production at Platform Harmony, which requires no
3 response. To the extent that a response is required, Sable's communication speaks
4 for itself and is the best evidence of its content. Sable denies any allegations in
5 Paragraph 90 that are inconsistent with the plain language, meaning and context of
6 Sable's communication.

7 91. Sable admits that on May 28, 2025 BSEE issued a FONSI and relied
8 on an EA regarding the Santa Ynez Unit request for extension of time to resume
9 operations and that on May 29, 2025 BSEE issued a decision re-affirming the
10 extension of time to resume operations. The remainder of Paragraph 91 purports to
11 characterize these documents, which requires no response. To the extent that a
12 response is required, the EA/FONSI and BSEE decision speak for themselves and
13 are the best evidence of their content. Sable denies any allegations in Paragraph 91
14 that are inconsistent with the plain language, meaning and context of the
15 EA/FONSI and decision re-affirming the extension of time to resume operations.

16 92. Sable admits that BSEE issued nine APMs to Sable between July 2
17 and July 3, 2025. The remainder of Paragraph 92 purports to characterize these
18 APMs, which requires no response. To the extent that a response is required, the
19 APMs speak for themselves and are the best evidence of their content. Sable
20 denies any allegations in Paragraph 92 that are inconsistent with the plain
21 language, meaning and context of the APMs.

22 93. Paragraph 93 purports to characterize a DOI press release, which
23 requires no response. To the extent that a response is required, the press release
24 speaks for itself and is the best evidence of its content. Sable denies any
25 allegations in Paragraph 93 that are inconsistent with the plain language, meaning
26 and context of the press release.

27 94. The allegations in the first sentence of Paragraph 94 purport to
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1 characterize certain onshore construction work, are vague and ambiguous and,
2 accordingly, no response is required. To the extent that a response is required,
3 Sable denies that the paragraph accurately characterizes the onshore construction
4 work. The allegations in the second, third, fourth, fifth, and sixth sentences
5 purport to characterize documents issued by the California Coastal Commission,
6 which speak for themselves and are the best evidence of their contents. Sable
7 denies any allegations in the second, third, fourth, fifth, and sixth sentences of
8 Paragraph 94 that are inconsistent with the plain language, meaning and context of
9 the documents. Sable admits that it filed suit against the California Coastal
10 Commission. The remaining allegations in the seventh sentence purporting to
11 characterize Sable's onshore construction work are vague and ambiguous and,
12 accordingly, no response is required. To the extent that a response is required,
13 Sable denies that this sentence accurately characterizes the onshore construction
14 work. The seventh sentence also purports to characterize Sable's investor
15 communications, which requires no response. To the extent a response is required,
16 these communications speak for themselves and are the best evidence of their
17 contents. Sable denies any allegations in the seventh sentence of Paragraph 94 that
18 are inconsistent with the plain language of the investor communications. The
19 allegations in the eighth and ninth sentences of Paragraph 94 purport to
20 characterize April 10 orders issued by the California Coastal Commission and a
21 ruling by the Santa Barbara County Superior Court, which requires no response.
22 To the extent that a response is required, the California Coastal Commission orders
23 and Court ruling speak for themselves and are the best evidence of their content.
24 Sable denies any allegations in the eighth and ninth sentences of Paragraph 94 that
25 are inconsistent with the plain language of the California Coastal Commission
26 orders and Court ruling.

27 95. Paragraph 95 purports to characterize notices of violations issued by
28

1 the California Geologic Energy Management Division, Central Coast Regional
2 Water Quality Board, and California Department of Fish and Wildlife, which speak
3 for themselves and are the best evidence of their contents. Sable denies any
4 allegations Paragraph 95 that are inconsistent with the plain language, meaning and
5 context of the documents.

6 96. Paragraph 96 purports to characterize a filing from the Santa Barbara
7 County District Attorney, which speaks for itself and is the best evidence of its
8 contents. Sable denies any allegations in Paragraph 96 that are inconsistent with
9 the plain language, meaning, and context of that filing.

10 97. Paragraph 97 purports to characterize a filing from the California
11 Attorney General, which speaks for itself and is the best evidence of its contents.
12 Sable denies any allegations in Paragraph 97 that are inconsistent with the plain
13 language, meaning, and context of that filing.

14 98. Paragraph 98 purports to characterize Sable's communications with its
15 investors, which requires no response. To the extent that a response is required,
16 the unspecified communications speak for themselves and are the best evidence of
17 their content. Sable denies any allegations in Paragraph 98 that are inconsistent
18 with the plain language, meaning and context of the communications.

19 99. The allegations in Paragraph 99 are denied.

20 100. The allegations in Paragraph 100 purport to characterize the risks
21 from routine oil and gas operations, are vague and ambiguous and, accordingly, no
22 response is required. To the extent that a response is required, Sable denies that
23 the paragraph accurately characterizes the risks from routine oil and gas
24 operations.

25 101. The allegations in Paragraph 101 purport to characterize the risks of
26 crude oil to fish, are vague and ambiguous and, accordingly, no response is
27 required. To the extent that a response is required, Sable denies that the paragraph
28

1 accurately characterizes the risks of crude oil to fish. The last sentence of
2 Paragraph 101 purports to characterize a document, which is the best evidence of
3 its content. On that basis, Sable denies any allegations in the last sentence of
4 Paragraph 101 that is inconsistent with the plain language of the document.

5 102. The allegations in Paragraph 102 purport to characterize the risks of
6 crude oil to threatened and endangered species are vague and ambiguous, and,
7 accordingly, no response is required. To the extent that a response is required,
8 Sable denies that the paragraph accurately characterizes the risks of crude oil to
9 threatened and endangered species.

10 103. Sable denies the first and third sentences of Paragraph 103. Sable
11 admits that production began at the Santa Ynez Unit in 1981, and the last platforms
12 were installed in 1989.

13 104. Sable denies allegations in the first sentence of Paragraph 104. The
14 allegations in the second sentence of Paragraph 104 are vague and ambiguous and
15 denied on that basis. Sable avers that the Plains All American Pipeline is not in the
16 Santa Ynez Unit. The third sentence of Paragraph 104 purports to characterize an
17 unidentified document, which speaks for itself and is the best evidence of its
18 content. Sable denies any allegations in Paragraph 104 that are inconsistent with
19 the plain language of the document.

20 105. The allegations in Paragraph 105 purport to characterize unidentified
21 studies, which speak for themselves and are the best evidence of their contents.
22 Sable lacks sufficient information to form a belief as to the truth or accuracy of the
23 allegations in Paragraph 105 and denies them on that basis. The fourth sentence in
24 Paragraph 105 purports to characterize the Pipeline and Hazardous Materials
25 Safety Administration's pipeline safety risk indicator, which speaks for itself and is
26 the best evidence of its contents. Sable denies any allegations in the fourth
27 sentence of Paragraph 105 that are inconsistent with the plain language of that
28

1 document.

2 106. Paragraph 106 purports to characterize unidentified studies, which
3 speak for themselves and are the best evidence of their contents. Sable lacks
4 sufficient information to form a belief as to the truth or accuracy of the allegations
5 in Paragraph 106 and denies them on that basis.

6 107. The allegations in Paragraph 107 purport to characterize unidentified
7 federal records, which speak for themselves and are the best evidence of their
8 contents. To the extent that a response is required, Sable denies any allegations
9 that are inconsistent with the plain language of the records.

10 108. The allegations in Paragraph 108 purport to characterize the risks of
11 well stimulation treatments such as hydraulic fracturing and acidizing, and are
12 vague and ambiguous and are denied on that basis. To the extent that a response is
13 required, Sable denies that the paragraph accurately characterizes the risks of well
14 stimulation treatments. The fourth sentence of Paragraph 108 purports to
15 characterize a statement attributed to ExxonMobil. Sable lacks sufficient
16 information to form a belief as to the truth of the allegations in the fourth sentence
17 of Paragraph 108 and denies it on that basis.

18 109. The allegations in the first, third, fourth and fifth sentences of
19 Paragraph 109 purport to characterize air impacts from oil and gas drilling, are
20 vague and ambiguous and, accordingly, no response is required. To the extent that
21 a response is required, Sable denies that the paragraph accurately characterizes the
22 air impacts from oil and gas drilling. Further, the second sentence of Paragraph
23 109 purports to quote and characterize a statute, which requires no response. The
24 statute speaks for itself and is the best evidence of its content and is denied on that
25 basis.

26 110. The allegations in Paragraph 110 purport to characterize discharges
27 from oil and gas drilling, are vague and ambiguous and, accordingly, no response
28

1 is required. To the extent that a response is required, Sable denies that the
2 paragraph accurately characterizes discharges from oil and gas drilling. Further,
3 the second sentence of Paragraph 110 purports to characterize a permit, which is
4 the best evidence of its content and is denied on that basis.

5 111. The allegations in Paragraph 111 purport to characterize the risk of
6 vessel traffic, are vague and ambiguous and, accordingly, no response is required.
7 To the extent that a response is required, Sable denies that the paragraph accurately
8 characterizes the risk of vessel traffic, including from oil and gas drilling.

9 112. The allegations in Paragraph 112 purport to characterize the risk of
10 climate change from oil and gas drilling by unnamed scientists, are vague and
11 ambiguous and, accordingly, no response is required. To the extent that a response
12 is required, Sable denies that the paragraph accurately characterizes the risk of
13 climate change.

14 113. The allegations in Paragraph 113 purport to characterize various
15 ExxonMobil applications and BSEE decisions, which speak for themselves and are
16 the best evidence of their contents. To the extent that a response is required, Sable
17 denies any allegations in Paragraph 113 that are inconsistent with the plain
18 language, meaning and context of the documents. Sable admits that the 2023
19 extension of time to resume operations was originally set to expire on December
20 13, 2024. Sable avers that it completed well re-working operations approved by
21 BSEE at Well HE-23 as of October 9, 2024 and Sable completed well re-working
22 operations approved by BSEE at Well HE-28 as of December 9, 2024. The
23 completed work extended the time to resume operations on the Santa Ynez Unit
24 leases until December 9, 2025. The May 15, 2025 resumption of production from
25 Platform Harmony to the storage tanks at Las Flores Canyon also maintains the
26 leases, as does additional well re-work.

27 114. The allegations in Paragraph 114 purport to characterize the content of
28

1 the BSEE's November 2023 extension of time to resume operations, which speaks
2 for itself and is the best evidence of its content. Sable denies any allegations in
3 Paragraph 114 that are inconsistent with the plain language, meaning and context
4 of the document.

5 115. The allegations in Paragraph 115 purport to characterize the content of
6 the BSEE's November 2023 extension of time to resume operations, which speaks
7 for itself and is the best evidence of its content. Sable denies any allegations in
8 Paragraph 115 that are inconsistent with the plain language, meaning and context
9 of the document.

10 116. Paragraph 116 contains legal conclusions, which require no response.
11 To the extent that a response is required, Sable denies the allegations in Paragraph
12 116.

13 117. The allegations in Paragraph 117 purport to characterize the content of
14 the BSEE's November 2023 extension of time to resume operations, which speaks
15 for itself and is the best evidence of its content. Sable denies any allegations in
16 Paragraph 117 that are inconsistent with the plain language, meaning and context
17 of the document.

18 118. With respect to the allegations in Paragraph 118, Sable admits that
19 BSEE used a categorical exclusion in connection with the November 2023
20 extension of time to resume operations and denies that an environmental impact
21 statement ("EIS") or environmental assessment was required.

22 119. The allegations in Paragraph 119 purport to characterize the content of
23 the BSEE's Categorical Exclusion Review, which speaks for itself and is the best
24 evidence of its content. Sable denies any allegations in Paragraph 119 that are
25 inconsistent with the plain language, meaning and context of the document.

26 120. The allegations in Paragraph 120 purport to characterize the content of
27 the BSEE's Categorical Exclusion Review, which speaks for itself and is the best
28

1 evidence of its content. Sable denies any allegations in Paragraph 120 that are
2 inconsistent with the plain language, meaning and context of the document.

3 121. The allegations in Paragraph 121 purport to characterize the content of
4 the BSEE's Categorical Exclusion Review, which speaks for itself and is the best
5 evidence of its content. Sable denies any allegations in Paragraph 121 that are
6 inconsistent with the plain language, meaning and context of the document.

7 122. The allegations in Paragraph 122 purport to characterize the content of
8 the BSEE's Categorical Exclusion Review, which speaks for itself and is the best
9 evidence of its content. Sable denies any allegations in Paragraph 122 that are
10 inconsistent with the plain language, meaning and context of the document.

11 123. The allegations in Paragraph 123 purport to characterize the content of
12 the BSEE's Categorical Exclusion Review, which speaks for itself and is the best
13 evidence of its content. Sable denies any allegations in Paragraph 123 that are
14 inconsistent with the plain language, meaning and context of the document.

15 124. The allegations in Paragraph 124 purport to characterize the content of
16 the BSEE's Categorical Exclusion Review, which speaks for itself and is the best
17 evidence of its content. Sable denies any allegations in Paragraph 124 that are
18 inconsistent with the plain language, meaning and context of the document.

19 125. Sable denies the allegations in Paragraph 125.

20 126. Sable lacks knowledge or information sufficient to form a belief about
21 the truth of the assertions in Paragraph 126, and, on that basis, denies the same.

22 127. The allegations in Paragraph 127 purport to characterize the content of
23 Sable's applications, which speak for themselves and are the best evidence of their
24 content. Sable denies any allegations in Paragraph 127 that are inconsistent with
25 the plain language, meaning and context of the documents.

26 128. The first, third, and fourth sentences of Paragraph 128 purport to
27 characterize the status of the wells and activities associated with well perforation,
28

1 are vague and ambiguous and, accordingly, no response is required. Sable admits
2 that the Santa Ynez Unit was shut-in in 2015, but avers that production resumed on
3 May 15, 2025. To the extent that a response is required, Sable denies that these
4 sentences accurately characterize the status of the wells or well perforation
5 activities. The second sentence of Paragraph 128 purports to characterize permits
6 issued by BSEE, which speak for themselves and are the best evidence of their
7 content. Sable denies any allegations in the second sentence that are inconsistent
8 with the plain language, meaning and context of the documents.

9 129. Paragraph 129 contains legal conclusions, which require no response.
10 To the extent a response is required, Sable denies the allegations in Paragraph 129.

11 130. The allegations in Paragraph 130 purport to characterize the content of
12 BSEE's Categorical Exclusion Reviews, which speak for themselves and are the
13 best evidence of their content. Sable denies any allegations in Paragraph 130 that
14 are inconsistent with the plain language, meaning and context of the documents.

15 131. The allegations in Paragraph 131 purport to characterize the content of
16 BSEE's Categorical Exclusion Reviews, which speaks for themselves and are the
17 best evidence of their content. Sable denies any allegations in Paragraph 131 that
18 are inconsistent with the plain language, meaning and context of the documents.

19 132. The allegations in Paragraph 132 purport to characterize the content of
20 the development and production plans, which speak for themselves and are the best
21 evidence of their content. Sable denies any allegations in Paragraph 132 that are
22 inconsistent with the plain language, meaning and context of the documents.

23 133. Sable denies the allegations in Paragraph 133.

24 134. Sable denies the allegations in Paragraph 134.

25 135. The allegations in Paragraph 135 purport to characterize the content of
26 BSEE's Categorical Exclusion Reviews, which speak for themselves and are the
27 best evidence of their content. To the extent a response is required, Sable denies
28

1 any allegations in Paragraph 135 that are inconsistent with the plain language,
2 meaning and context of the documents.

3 136. The allegations in Paragraph 136 purport to characterize the content of
4 BSEE's Categorical Exclusion Reviews, which speak for themselves and are the
5 best evidence of their content. To the extent a response is required, Sable denies
6 any allegations in Paragraph 136 that are inconsistent with the plain language,
7 meaning and context of the documents.

8 137. The allegations in Paragraph 137 purport to characterize the content of
9 BSEE's Categorical Exclusion Reviews, which speak for themselves and are the
10 best evidence of their content. To the extent a response is required, Sable denies
11 any allegations in Paragraph 137 that are inconsistent with the plain language,
12 meaning and context of the documents.

13 138. The allegations in Paragraph 138 purport to characterize the content of
14 BSEE's Categorical Exclusion Reviews, which speak for themselves and are the
15 best evidence of their content. To the extent a response is required, Sable denies
16 any allegations in Paragraph 138 that are inconsistent with the plain language,
17 meaning and context of the documents.

18 139. The allegations in Paragraph 139 purport to characterize the content of
19 BSEE's Categorical Exclusion Reviews, which speak for themselves and are the
20 best evidence of their content. To the extent a response is required, Sable denies
21 any allegations in Paragraph 139 that are inconsistent with the plain language,
22 meaning and context of the documents.

23 140. The allegations in Paragraph 140 purport to characterize the content of
24 BSEE's Categorical Exclusion Reviews, which speak for themselves and are the
25 best evidence of their content. To the extent a response is required, Sable denies
26 any allegations in Paragraph 140 that are inconsistent with the plain language,
27 meaning and context of the documents.
28

1 141. The allegations in Paragraph 141 purport to characterize the content of
2 BSEE's Categorical Exclusion Reviews, which speak for themselves and are the
3 best evidence of their content. To the extent a response is required, Sable denies
4 any allegations in Paragraph 141 that are inconsistent with the plain language,
5 meaning and context of the documents.

6 142. The allegations in Paragraph 142 purport to characterize the content of
7 BSEE's Categorical Exclusion Reviews, which speaks for themselves and are the
8 best evidence of their content. To the extent a response is required, Sable denies
9 any allegations in Paragraph 142 that are inconsistent with the plain language,
10 meaning and context of the documents.

11 143. The allegations in Paragraph 143 contain legal conclusions, which do
12 not require a response. To the extent a response is required, Sable denies the
13 allegations in Paragraph 143.

14 144. Sable admits that from July 2 to July 3, 2025, BSEE approved nine
15 APMs and that on July 24, 2025, BSEE approval one APM. The remainder of
16 Paragraph 144 purports to characterize the work approved under these APMs,
17 which speak for themselves and are the best evidence of their content. To the
18 extent a response is required, Sable denies any allegations in Paragraph 144 that
19 are inconsistent with the APMs.

20 145. The allegations in the first, second, and fifth sentences of Paragraph
21 145 purport to characterize NEPA analyses, are vague and ambiguous, contain
22 legal conclusions and, accordingly, no response is required. To the extent that a
23 response is required, Sable denies that the paragraph accurately characterizes
24 NEPA analyses relating to the Santa Ynez Unit. The allegations in the third and
25 fourth sentences of Paragraph 145 purport to characterize the effects of the 2015
26 oil spill on the environment and fisheries. Sable lacks knowledge or information
27 sufficient to form a belief about the truth of the assertions in the third and fourth
28

1 sentences of Paragraph 145, and, on that basis, denies the same. The sixth
2 sentence in Paragraph 145 purports to characterize Sable's worst-case spill
3 analyses, which speak for themselves and are the best evidence of their content.
4 To the extent a response is required, Sable denies Plaintiffs' characterization of
5 these analyses.

6 146. The allegations in the first sentence of Paragraph 146 purport to
7 characterize environmental analysis, are vague and ambiguous and, accordingly,
8 no response is required. To the extent that a response is required, Sable denies that
9 the first sentence of Paragraph 146 accurately characterizes environmental analysis
10 of federal oil and gas activities in the Santa Barbara Channel. The allegations in
11 the second and third sentences of Paragraph 146 purport to characterize the content
12 of a 1975 EIS, which speaks for itself and is the best evidence of its content. To
13 the extent that a response is required, Sable denies any allegations in Paragraph
14 146 that are inconsistent with the plain language, meaning and context of the
15 document.

16 147. Sable admits that development and production plans for the Santa
17 Ynez Unit were prepared in 1982. Sable admits that DOI issued an EIS for the
18 Santa Ynez Unit development and production plans in 1984.

19 148. The allegations in Paragraph 148 purport to characterize the content of
20 BSEE's approvals of permits, which speaks for themselves and are the best
21 evidence of their content. To the extent that a response is required, Sable denies
22 any allegations in Paragraph 148 that are inconsistent with the plain language,
23 meaning and content of the documents.

24 149. The allegations in Paragraph 149 purport to characterize the content of
25 unidentified environmental assessments, which speak for themselves and are the
26 best evidence of their contents. To the extent that a response is required, Sable
27 denies any allegations in Paragraph 149 that are inconsistent with the plain
28

1 language, meaning and content of the documents.

2 150. The allegations in the first sentence of Paragraph 150 are vague and
3 ambiguous and are denied on that basis. The remaining allegations in Paragraph
4 150 purport to characterize the contents of development plans and environmental
5 analysis, which speak for themselves and are the best evidence of their contents.
6 Sable denies any allegations in Paragraph 150 that are inconsistent with the plain
7 language, meaning and context of the documents. Sable denies the allegation in
8 the final sentence of Paragraph 150.

9 151. The allegations in the first sentence of Paragraph 151 are vague and
10 ambiguous and are denied on that basis. The allegations in Paragraph 151 purport
11 to characterize the contents of development and production plans and an
12 unspecified BSEE report, which speak for themselves and are the best evidence of
13 their contents. Sable denies any allegations that are inconsistent with the plain
14 language, meaning and context of these documents.

15 152. The allegations in Paragraph 152 purport to characterize drilling
16 techniques and their relationship to prior unidentified environmental analysis, are
17 vague and ambiguous and, accordingly, no response is required. To the extent that
18 a response is required, Sable denies that the paragraph accurately characterizes the
19 drilling techniques, their relationship to prior environmental analysis or Sable's
20 plans.

21 153. The allegations in the first sentence of Paragraph 153 purport to
22 characterize the content of a federal designation of a National Marine Sanctuary,
23 which speaks for itself and is the best evidence of its contents. Sable denies any
24 allegations in Paragraph 153 that are inconsistent with the plain language, meaning
25 and context of the designation. The allegations in the second sentence of
26 Paragraph 153 purport to characterize a National Marine Sanctuary, are vague and
27 ambiguous and, accordingly, no response is required. To the extent that a response
28

1 is required, Sable denies that the sentence accurately characterizes the National
2 Marine Sanctuary. Sable denies Plaintiffs' allegation that "a restart will adversely
3 affect" the cultural and environmental values of the sanctuary.

4 154. The allegations in the first sentence of Paragraph 154 purport to
5 characterize NEPA analyses, are vague and ambiguous, contain legal conclusions
6 and, accordingly, no response is required. To the extent that a response is required,
7 Sable denies that the paragraph accurately characterizes NEPA analyses relating to
8 the Santa Ynez Unit. The allegations in the second sentence of Paragraph 154
9 purport to characterize contents of a development plan and NEPA documents,
10 which speak for themselves and are the best evidence of their contents. Sable
11 denies any allegations that are inconsistent with the plain language, meaning and
12 context of these documents. Sable lacks sufficient information to form a belief as
13 to the truth of the assertions in the third and fourth sentences of Paragraph 154,
14 and, on that basis, denies the same.

15 155. The allegations in Paragraph 155 purport to characterize the content of
16 prior NEPA documents, which speak for themselves and are the best evidence of
17 their contents. Sable denies any allegations inconsistent with the plain language,
18 meaning and context of the documents.

19 156. The allegations in Paragraph 156 purport to characterize actions taken
20 by the federal government under the Endangered Species Act and NEPA, are
21 vague and ambiguous and, accordingly, no response is required. To the extent that
22 a response is required, Sable denies that the paragraph accurately characterizes
23 actions that may have been taken under the Endangered Species Act and NEPA.

24 157. The first sentence of Paragraph 157 sets forth legal conclusions,
25 which require no response. To the extent that a response is required, Sable denies
26 the allegations in the first sentence of Paragraph 157. The second sentence of
27 Paragraph 157 purports to characterize Sable's communications with its investors,
28

1 which requires no response. The unspecified communications speak for
2 themselves and are the best evidence of their content. The remaining allegations in
3 Paragraph 157 are vague and ambiguous and are denied on that basis.

4 158. Sable lacks information sufficient to form a belief about the truth of
5 the assertions in Paragraph 158, and, on that basis, denies the same.

6 159. Paragraph 159 sets forth legal conclusions, which require no response.
7 To the extent a response is required, Sable denies the allegations in Paragraph 159.

8 160. The allegations in Paragraph 160 purport to characterize the content of
9 the 2025 EA/FONSI, which speak for themselves and are the best evidence of their
10 content. To the extent a response is required, Sable denies any allegations in
11 Paragraph 160 that are inconsistent with the plain language, meaning and context
12 of the documents.

13 161. Paragraph 161 sets forth legal conclusions, which require no response.
14 To the extent a response is required, Sable denies the allegations in Paragraph 161.
15 The third sentence of Paragraph 161 also purports to characterize unspecified
16 BSEE communications, which requires no response. To the extent a response is
17 required, these unspecified communications speak for themselves and are the best
18 evidence of their contents. Sable denies any allegations in the third sentence of
19 Paragraph 161 that are inconsistent with the plain language, meaning, and context
20 of these communications.

21 162. Paragraph 162 sets forth legal conclusions, which require no response.
22 To the extent a response is required, Sable denies the allegations in Paragraph 162.

23 163. The first sentence of Paragraph 163 sets forth legal conclusions,
24 which require no response. To the extent that a response is required, Sable denies
25 the allegations in the first sentence of Paragraph 163. The first, second, third,
26 fourth, and fifth sentences of Paragraph 163 purport to characterize the 2025
27 EA/FONSI and Sable's Oil Spill Response Plan, which speak for themselves and
28

1 are the best evidence of their content. To the extent a response is required, Sable
2 denies Plaintiffs' characterization of the EA/FONSI and the Oil Spill Response
3 Plan.

4 164. Paragraph 164 purports to characterize the 2025 EA/FONSI and
5 appendices, which speak for themselves and are the best evidence of their content.
6 To the extent a response is required, Sable denies Plaintiffs' characterization of the
7 EA/FONSI and appendices.

8 165. Paragraph 165 sets forth legal conclusions, which require no response.
9 To the extent a response is required, Sable denies the allegations in Paragraph 165.

10 166. Paragraph 166 sets forth legal conclusions, which require no response.
11 To the extent that a response is required, the EA/FONSI speak for themselves and
12 are the best evidence of their content. Sable denies any allegations in Paragraph
13 166 that are inconsistent with the plain language, meaning and context of the
14 EA/FONSI

15 167. Paragraph 167 sets forth legal conclusions, which require no response.
16 To the extent that a response is required, the BSEE decision speaks for itself and is
17 the best evidence of its content. Sable denies any allegations in Paragraph 167 that
18 are inconsistent with the plain language, meaning and context of the BSEE
19 decision.

20 168. Paragraph 168 sets forth a legal conclusion, which requires no
21 response. To the extent a response is required, Sable denies the allegations in
22 Paragraph 168.

Claims for Relief

First Claim for Relief

25 169. Sable incorporates by reference its responses to the allegations in
26 Paragraphs 1 through 168.

27 170. Paragraph 170 purports to quote a statute, which requires no response.
28

1 To the extent that a response is required, the statute speaks for itself and is the best
2 evidence of its content. Sable denies any allegations in Paragraph 170 that are
3 inconsistent with the plain language of the statute.

4 171. Paragraph 171 contains Plaintiffs' characterization of a statute and
5 regulations, which requires no response. To the extent that a response is required,
6 the statute and regulations speak for themselves and are the best evidence of their
7 content. Sable denies any allegations in Paragraph 171 that are inconsistent with
8 the plain language of the statute and regulations.

9 172. Paragraph 172 contains Plaintiffs' characterization of regulations,
10 which requires no response. To the extent that a response is required, the
11 regulations speak for themselves and are the best evidence of their content. Sable
12 denies any allegations in Paragraph 172 that are inconsistent with the plain
13 language of the regulations.

14 173. Paragraph 173 sets forth legal conclusions, which require no response.
15 To the extent that a response is required, Sable denies the allegations in
16 Paragraph 173

17 174. Paragraph 174 sets forth legal conclusions, which require no response.
18 To the extent that a response is required, Sable denies the allegations in
19 Paragraph 174.

20 **Second Claim for Relief**

21 175. Sable incorporates by reference its responses to the allegations
22 contained in Paragraphs 1 through 168.

23 176. Paragraph 176 contains Plaintiffs' characterization of a statute and
24 regulations, which requires no response. To the extent that a response is required,
25 the statute and regulations speak for themselves and are the best evidence of their
26 content. Sable denies any allegations in Paragraph 176 that are inconsistent with
27 the plain language of the statute and regulations.

1 177. Paragraph 177 sets forth a legal conclusion, which requires no
2 response. To the extent that a response is required, Sable denies the allegation in
3 Paragraph 177.

4 178. Paragraph 178 sets forth legal conclusions, which require no response.
5 To the extent that a response is required, Sable denies the allegations in
6 Paragraph 178.

7 179. Paragraph 179 sets forth legal conclusions, which require no response.
8 To the extent that a response is required, Sable denies the allegations in
9 Paragraph 179.

10 180. Paragraph 180 sets forth legal conclusions, which require no response.
11 To the extent that a response is required, Sable denies the allegations in
12 Paragraph 180.

13 181. Paragraph 181 sets forth legal conclusions, which require no response.
14 To the extent that a response is required, Sable denies the allegations in
15 Paragraph 181.

16 182. Paragraph 182 sets forth legal conclusions, which require no response.
17 To the extent that a response is required, Sable denies the allegations in
18 Paragraph 182.

19 **Third Claim For Relief**

20 183. Sable incorporates by reference its responses to the allegations
21 contained in Paragraphs 1 through 168.

22 184. Paragraph 184 contains Plaintiffs' characterization of a statute and
23 regulations, which requires no response. To the extent that a response is required,
24 the statute and regulations speak for themselves and are the best evidence of their
25 content. Sable denies any allegations in Paragraph 184 that are inconsistent with
26 the plain language of the statute and regulations.

27 185. Paragraph 185 sets forth legal conclusions, which require no response.
28

1 To the extent that a response is required, Sable denies the allegations in Paragraph
2 185.

3 186. Paragraph 186 sets forth legal conclusions, which require no response.
4 To the extent that a response is required, Sable denies the allegations in Paragraph
5 186.

6 187. Paragraph 187 sets forth legal conclusions, which require no response.
7 To the extent that a response is required, Sable denies the allegations in Paragraph
8 187.

9 188. Paragraph 188 sets forth legal conclusions, which require no response.
10 To the extent that a response is required, Sable denies the allegations in Paragraph
11 188.

12 189. Paragraph 189 sets forth legal conclusions, which require no response.
13 To the extent that a response is required, Sable denies the allegations in Paragraph
14 189.

15 190. Paragraph 190 sets forth legal conclusions, which require no response.
16 To the extent that a response is required, Sable denies the allegations in Paragraph
17 190.

18 191. Paragraph 191 sets forth legal conclusions, which require no response.
19 To the extent that a response is required, Sable denies the allegations in Paragraph
20 191.

21 192. Paragraph 192 sets forth legal conclusions, which require no response.
22 To the extent that a response is required, Sable denies the allegations in Paragraph
23 192.

24 **Fourth Claim for Relief**

25 193. Sable reincorporates by reference its responses to the allegations
26 contained in Paragraphs 1 through 168.

27 194. Paragraph 194 contains Plaintiffs' characterization of a statute and
28

1 regulations, which requires no response. To the extent that a response is required,
2 the statute and regulations speak for themselves and are the best evidence of their
3 content. Sable denies any allegations in Paragraph 194 that are inconsistent with
4 the plain language of the statute and regulations.

5 195. Paragraph 195 contains Plaintiffs' characterization of a statute and
6 characterization and quotation of regulations, which requires no response. To the
7 extent that a response is required, the statute and regulations speak for themselves
8 and are the best evidence of their contents. Sable denies any allegations in
9 Paragraph 195 that are inconsistent with the plain language of the statute and
10 regulations.

11 196. Paragraph 196 sets forth legal conclusions, which require no response.
12 To the extent a response is required, Sable denies the allegations in Paragraph 196.

13 197. The allegations in Paragraph 197 purport to characterize NEPA
14 analyses, which speak for themselves and are the best evidence of their contents.
15 Sable denies any allegations in Paragraph 197 that are inconsistent with the plain
16 language, meaning and context of these documents. Paragraph 197 also sets forth
17 legal conclusions, which require no response. To the extent a response is required,
18 Sable denies the allegations in Paragraph 197.

19 198. Paragraph 198 sets forth legal conclusions, which require no response.
20 To the extent a response is required, Sable denies the allegations in Paragraph 198.

21 199. Paragraph 199 sets forth legal conclusions, which require no response.
22 To the extent a response is required, Sable denies the allegations in Paragraph 199.

23 200. Paragraph 200 sets forth legal conclusions, which require no response.
24 To the extent a response is required, Sable denies the allegations in Paragraph 200.

25 **Fifth Claim for Relief**

26 201. Sable reincorporates by reference its responses to the allegations
27 contained in Paragraphs 1 through 168.

1 202. Paragraph 202 contains Plaintiffs' characterization of a statute and
2 court opinion, which requires no response. To the extent that a response is
3 required, the statute and court opinion speak for themselves and are the best
4 evidence of their content. Sable denies any allegations in Paragraph 202 that are
5 inconsistent with the plain language of the statute and court opinion.

6 203. Paragraph 203 contains Plaintiffs' characterization of a statute and
7 court opinions, which requires no response. To the extent that a response is
8 required, the statute and court opinions speak for themselves and are the best
9 evidence of their content. Sable denies any allegations in Paragraph 203 that are
10 inconsistent with the plain language of the statute and court opinions.

11 204. Paragraph 204 sets forth legal conclusions, which require no response.
12 To the extent a response is required, Sable denies the allegations in Paragraph 204.

13 205. Paragraph 205 sets forth legal conclusions, which require no response.
14 To the extent a response is required, Sable denies the allegations in Paragraph 205.

15 206. The allegations in Paragraph 206 purport to characterize the 2025
16 EA/FONSI, which speak for themselves and are the best evidence of their contents.
17 Sable denies any allegations in Paragraph 206 that are inconsistent with the plain
18 language, meaning and context of these documents. Paragraph 206 also sets forth
19 legal conclusions, which require no response. To the extent a response is required,
20 Sable denies the allegations in Paragraph 206.

21 207. The allegations in Paragraph 207 purport to characterize the
22 EA/FONSI, which speak for themselves and are the best evidence of their contents.
23 Sable denies any allegations in Paragraph 207 that are inconsistent with the plain
24 language, meaning and context of these documents. Paragraph 207 also sets forth
25 legal conclusions, which require no response. To the extent a response is required,
26 Sable denies the allegations in Paragraph 207.

27 208. The allegations in Paragraph 208 purport to characterize the
28

EA/FONSI, which speak for themselves and are the best evidence of their contents. Sable denies any allegations in Paragraph 208 that are inconsistent with the plain language, meaning and context of these documents. Paragraph 208 also sets forth legal conclusions, which require no response. To the extent a response is required, Sable denies the allegations in Paragraph 208.

209. Paragraph 209 sets forth legal conclusions, which require no response. To the extent a response is required, Sable denies the allegations in Paragraph 209.

210. Paragraph 210 sets forth legal conclusions, which require no response. To the extent a response is required, Sable denies the allegations in Paragraph 210.

Sable denies any allegations in the Second Supplemental and Amended Complaint, whether express or implied, that are not expressly admitted, denied or qualified above.

Request for Relief

Sable denies that Plaintiffs are entitled to any relief.

DEFENSES

Sable states that it will rely upon one or more of the following defenses. Sable asserts the following defenses without assuming any burden of proof of such defenses that would otherwise rest on Plaintiffs. Notwithstanding the enumeration of specific defenses set forth below, Sable reserves unto itself all of those defenses set forth in Rule 8(c) of the Federal Rules of Civil Procedure and such other defenses, affirmative and otherwise, as may prove to be applicable, and hereby reserves unto itself all of its rights associated with any such claim or potential claim. Sable reserves the right to amend this Answer if investigation and further information warrant such amendment, and further, to assert any applicable matters of law during the pendency of this action.

First Defense

Plaintiffs lack standing to raise some or all of the claims in the Second Supplemental and Amended Complaint.

Second Defense

Plaintiffs fail to state a claim upon which relief can be granted for some or all of the claims in the Second Supplemental and Amended Complaint.

Third Defense

Plaintiffs' claims are barred in whole or in part by the doctrine of waiver.

Fourth Defense

Plaintiffs' claims are barred in whole or in part by the doctrine of laches.

Fifth Defense

Plaintiffs' claims are barred in whole or in part under the doctrine of harmless error.

Sixth Defense

Some or all of Plaintiffs' claims are not ripe for review.

Seventh Defense

Plaintiffs' claims are barred in whole or in part under the doctrine of mootness.

Eighth Defense

Plaintiffs' claims are barred in whole or in part because they failed to comply with OCSLA's pre-suit notice requirement under 43 U.S.C. § 1349(a).

RESERVATION

Sable reserves the right to add defenses as may be developed during litigation.

* * *

1 Sable respectfully requests that the Court enter judgment in favor of
2 Defendants.

3
4 Dated: November 24, 2025

Respectfully submitted,

5 LATHAM & WATKINS LLP

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